

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

SYMBOL TECHNOLOGIES, INC.,

Plaintiff,

05 C 0256 C

v.

INTERMEC TECHNOLOGIES CORP.,

Defendant.

DECLARATION OF THERESA HILLSTROM

THERESA HILLSTROM, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a Group Product Manager with Intermec Technologies Corporation ("Intermec"), the defendant in this lawsuit. I declare that I am over 18 years of age and I am competent to make this declaration based on my own personal knowledge.

2. I make this declaration in support of Intermec's Rule 26(c), F.R.Civ.P., Motion for Protective Order and in opposition to Symbol Technologies, Inc.'s ("Symbol") Rule 37(a), F.R.Civ.P., Motion to Compel Discovery.

3. I was asked by Freeborn & Peters, counsel to Intermec, to prepare a chart which demonstrates bar code readers capable of scanning PDF417 or RSS symbology that have been manufactured and sold with Symbol scan engines. Through my investigation, I have compiled the following chart:

Product Family	Product Model	Part number	Laser Scanner	Engine Manufacturer
Antares	2410	2410Axx36xxx	x	Symbol(SE900HS)
Antares	2415	2415Axx36xxxxxx	x	Symbol(SE900HS)
Trakker Antares	2420	T2420Axx36xx	x	Symbol(SE900HS)



Trakker Antares	2425	T2425Cxx36xxxxx	x	Symbol(SE900HS)
Na	CK30	CK30AAxxx2xxx	x	Symbol(SE1200SR)
Na	CK30	CK30AAxxx3xxx	x	Symbol(SE1200ALR)
Na	CK30	CK30AAxxx6xxx	x	Symbol(SE1200LR)
Na	CK30	CK30BAxxx2xxx	x	Symbol(SE1200SR)
Na	CK30	CK30BAxxx3xxx	x	Symbol(SE1200ALR)
Na	CK30	CK30BAxxx6xxx	x	Symbol(SE1200LR)
Na	CK30	CK30CAxxx2xxxxxx	x	Symbol(SE1200SR)
Na	CK30	CK30CAxxx3xxxxxx	x	Symbol(SE1200ALR)
Na	CK30	CK30CAxxx6xxxxxx	x	Symbol(SE1200LR)
Na	CK31	CK31CAxxx2xxxxxx	x	Symbol(SE1200SR)
Na	CK31	CK31CAxxx3xxxxxx	x	Symbol(SE1200ALR)
Na	CK31	CK31CAxxx6xxxxxx	x	Symbol(SE1200LR)
700 Family	720	720A0A1xxxxxxxxxx	x	Symbol(SE900SR)
700 Family	720	720A0A3xxxxxxxxxx	x	Symbol(SE900SR)
700 Family	720	720A0A2xxxxxxxxxx	x	Symbol
700 Family	720	720A0A4xxxxxxxxxx	x	Symbol
700 Family	741	741Ax500xxxxxxxxxx	x	Symbol(SE900SR)
700 Family	741	741Ax600xxxxxxxxxx	x	Symbol(SE900HS)
700 Family	751	751Ax500xxxxxxxxxx	x	Symbol(SE900SR)
700 Family	751	751Ax600xxxxxxxxxx	x	Symbol(SE900HS)
700 Family	761	761Ax5xxxxxxxxxx	x	Symbol(SE900SR)
700 Family	761	761Ax6xxxxxxxxxx	x	Symbol(SE900HS)
Sabre	1551	070304	x	Symbol
Sabre	1551	070719	x	Symbol
Sabre	1551	1551E0808	x	Symbol(SE900HS)
Sabre	1551	070300	x	Symbol(SE1200SR)
Sabre	1551	070301	x	Symbol(SE1200SR)
Sabre	1551	070302	x	Symbol(SE1200ALR)
Sabre	1551	070303	x	Symbol(SE1200SR)
Sabre	1551	070720	x	Symbol(SE1200SR)
Sabre	1551	1551E0600	x	Symbol(SE1200SR)
Sabre	1551	1551E0601	x	Symbol(SE1200ALR)
Sabre	1551	1551E0602	x	Symbol(SE1200LR)
Sabre	1551	1551E0604	x	Symbol(SE1200HP)
Sabre	1551	1551E0605	x	Symbol(SE1200HD)
Sabre	1553	1553E0603	x	Symbol(LS32 ER)
Scanplus	1800 ST	0-366052-00	x	Symbol(SE1200WA)
Scanplus	1800 ST	0-366057-00	x	Symbol(SE1200WA)

Scanplus	1800 ST	3-366058-01	x	Symbol(SE1200WA)
Scanplus	1800 ST	0-366019-01	x	Symbol(SE1200WA)
	6400		x	Symbol

4. The aforementioned products are the majority of Intermec's bar code readers capable of scanning and decoding PDF417 or RSS sold during the last six years.

I declare under penalties of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 13, 2005.


Theresa Hillstrom